

# EXHIBIT A-4

November 21, 2002

W.R. Grace

Page 137  
 Invoice No.: 613444  
 Client No.: 04339  
 Matter No.: 00302

**Itemized Disbursements**

Date	Qty	Description	Amount
10/30/02	22	Photocopy	3.30
10/30/02	502	Photocopy	75.30
10/30/02	5	Photocopy	0.75
10/30/02	112	Photocopy	16.80
10/30/02	237	Photocopy	35.55
10/30/02	66	Photocopy	9.90
10/30/02		Travel Expense: VENDOR: Majest International; INVOICE#: 19903; DATE: 10/30/2002 - Denver, Airfare, 11/14/02, Denver San Diego San Diego Denver, L. Brown	271.50
10/31/02	4	Facsimile	4.00
10/31/02	3	Facsimile	3.00
10/31/02	2	Facsimile	2.00
10/31/02	21	Facsimile	21.00
10/31/02	12	Facsimile	12.00
10/31/02	26	Facsimile	26.00
10/31/02	1	Lexis	41.25
10/31/02	1	Lexis	0.00
10/31/02	1	Lexis	154.19
10/31/02	1	Lexis	50.32
10/31/02	1	Lexis	274.68
10/31/02	1	Lexis	241.96
10/31/02		Long Distance Telephone: 4105314203, 1 Mins., TranTime:9:40	0.03
10/31/02		Long Distance Telephone: 4122884104, 9 Mins., TranTime:10:51	0.87
10/31/02		Long Distance Telephone: 4065232543, 3 Mins., TranTime:11:4	0.28
10/31/02		Long Distance Telephone: 4065232500, 2 Mins., TranTime:11:22	0.16
10/31/02		Long Distance Telephone: 4105314203, 4 Mins., TranTime:13:49	0.35

November 21, 2002

W.R. Grace

Page 138  
 Invoice No.: 613444  
 Client No.: 04339  
 Matter No.: 00302

**Itemized Disbursements**

Date	Qty	Description	Amount
10/31/02		Long Distance Telephone: 4105314751, 13 Mins., TranTime:14:6	1.28
10/31/02		Outside Courier: VENDOR: Federal Express Corporation; INVOICE#: 4-442-84804; DATE: 10/31/2002 - Courier, Acct. 0802-0410-8 10-21; Spherion Deposition Services San Diego, Ca	5.86
10/31/02		Outside Courier: VENDOR: Federal Express Corporation; INVOICE#: 4-442-84804; DATE: 10/31/2002 - Courier, Acct. 0802-0410-8 10-24; Linnea Brown Washington, DC	19.82
10/31/02		Outside Courier: VENDOR: Federal Express Corporation; INVOICE#: 4-442-84804; DATE: 10/31/2002 - Courier, Acct. 0802-0410-8 10-24; Rick Reiss Alexandria, Va	19.82
10/31/02		Outside Courier: VENDOR: Federal Express Corporation; INVOICE#: 4-442-84804; DATE: 10/31/2002 - Courier, Acct. 0802-0410-8 10-24; Linnea Brown Washington, DC	19.82
10/31/02		Outside Courier: VENDOR: Federal Express Corporation; INVOICE#: 4-442-84804; DATE: 10/31/2002 - Courier, Acct. 0802-0410-8 10-25; Robert Emmett Columbia, Md	13.29
10/31/02	395	Photocopy	59.25
10/31/02	237	Photocopy	35.55
10/31/02	207	Photocopy	31.05
10/31/02	117	Photocopy	17.55
10/31/02	273	Photocopy	40.95
10/31/02	188	Photocopy	28.20
10/31/02	18	Photocopy	2.70
10/31/02	60	Photocopy	9.00
10/31/02	127	Photocopy	19.05
10/31/02	171	Photocopy	25.65
10/31/02	13	Photocopy	1.95
10/31/02	22	Photocopy	3.30
10/31/02	9	Photocopy	1.35

November 21, 2002

W.R. Grace

Page 139  
 Invoice No.: 613444  
 Client No.: 04339  
 Matter No.: 00302

**Itemized Disbursements**

Date	Qty	Description	Amount
10/31/02	3,718	Photocopy	557.70
10/31/02	2,807	Photocopy	421.05
10/31/02	75	Photocopy	11.25
10/31/02	3,772	Photocopy	565.80
10/31/02	2,893	Photocopy	433.95
10/31/02	718	Photocopy	107.70
10/31/02	3,499	Photocopy	524.85
10/31/02	15	Photocopy	2.25
10/31/02	390	Photocopy	58.50
10/31/02	27	Photocopy	4.05
10/31/02	340	Photocopy	51.00
10/31/02	78	Photocopy	11.70
10/31/02	1,211	Photocopy	181.65
10/31/02	3	Photocopy	0.45
10/31/02	770	Photocopy	115.50
10/31/02		Travel Expense: VENDOR: Robert Fellingner; INVOICE#: 110102; DATE: 11/1/2002 - Site Preparation for Missoula Trial/Meals - Dinner for R. Fellingner and C. Thorne	110.70
10/31/02		Travel Expense: VENDOR: Robert Fellingner; INVOICE#: 110102; DATE: 11/1/2002 - Site Preparation for Missoula Trial/Personal Mileage	18.98
10/31/02		Travel Expense: VENDOR: Robert Fellingner; INVOICE#: 110102; DATE: 11/1/2002 - Site Preparation for Missoula Trial/Parking	30.00
10/31/02		Travel Expense: VENDOR: Majest International; INVOICE#: 19915; DATE: 10/31/2002 - Denver, Airfare, 11/14/02, Denver San Diego San Diego Denver, C. Neitzel	271.50
<b>Total Disbursements:</b>			<b>\$ 50,000.63</b>

November 21, 2002

W.R. Grace

Page 140  
 Invoice No.: 613444  
 Client No.: 04339  
 Matter No.: 00302

**Disbursement Summary**

Parking	\$	15.00
Photocopy		11,920.20
Facsimile		432.00
Long Distance Telephone		434.73
Outside Courier		1,935.84
Travel Expense		11,868.37
Postage		6.50
Lexis		17,882.64
Medical Report		29.00
Westlaw		171.28
Other Meal Expense		603.39
Other Expense		4,644.78
Color Photocopy		26.65
Velo Binding		19.00
Tab Stock		11.25
<b>Total Disbursements:</b>		<b>\$ 50,000.63</b>

**Accounts Receivable Detail**

Invoice	Date	Description	Amount
577764	10/30/01	Bill	5,425.00
		<i>Outstanding Balance on Invoice 577764:</i>	<i>\$ 5,425.00</i>
577905	10/31/01	Bill	64,445.24
		<i>Outstanding Balance on Invoice 577905:</i>	<i>\$ 64,445.24</i>

December 24, 2002

W.R. Grace

Page 16  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

**Regarding: Libby - Cost Recovery Case**

Itemized Services				
Date	Tkpr	Description	Hours	Value
10/23/02	CLN	Review and revise Response to summary judgment motion re selection of remedy, including genuine issues, and administrative record brief.	10.80	\$ 3,240.00
10/24/02	CLN	Review and revise Statement of Genuine Issues for Response to Selection of Remedy Brief.	11.50	3,450.00
11/01/02	LB	Office conference with KWLund and KJCoggon re trial preparation (2.80); conference call with Gary Graham and KJCoggon re various trial issues (.50); review and revise Power Point presentation for Betty Anderson (1.10); trial planning (1.9); telephone conference with JLSherman and KLKinnear re trial exhibits and Peronard (0.4); telephone conference with CLNeitzel re findings of fact and direct examinations of Moolgavkar and Hughson (.10).	6.80	2,720.00
11/01/02	KWL	Review Summary Judgment briefs and attached exhibits for purposes of integrating trial strategy (3.50); conference with KJCoggon and LBrown re trial strategy and coordination (2.80); telephone conference with Bob Emmett re trial team coordination and expert witness issues (.30).	6.60	2,310.00
11/01/02	LSD	Review Statement of Facts for purpose of compiling pre-trial stipulations (.90); begin compiling same (.60).	1.50	450.00

December 24, 2002

W.R. Grace

Page 17  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

**Itemized Services**

Date	Tkpr	Description	Hours	Value
11/01/02	KJC	Address billing issues from team, vendors and experts (0.20); address inquiries and issues re document databases (0.20); respond to questions from client and team re facts and documents (0.30); address trial logistics and issues (0.60); conference with LBrown and KWLund re trial preparation (2.80); telephone conference with G. Graham and LBrown re witnesses and trial preparation (0.50); telephone conference with JLSherman and KLKinnear re timeline (0.40); review and respond to letter from DOJ re privilege log (1.10); e-mail associates re additional trial preparation (0.30); address trial exhibit list issues (0.40).	6.80	1,870.00
11/01/02	EES	Review additional documents for possible use as cost trial exhibits (2.10); review Shapiro rebuttal report (1.70).	3.80	1,064.00
11/01/02	CCC	Review, categorize and code documents produced by EPA for relevance to various case issues.	9.00	2,340.00
11/01/02	NKA	Review and organize data re EPA sampling in Libby to support statement of facts and expert review (4.90); conference with WEPayne re issues and complications with First Supplemental CD, and arrange for replacement cd to be produced to DOJ per KJCoggon's request (1.20).	6.10	671.00
11/01/02	CKA	Review and organize data re EPA sampling in Libby to support statement of fact and expert review.	6.00	750.00
11/01/02	AEC	Review and organize data re EPA sampling in Libby to support statement of facts and expert review (4.2); assist KJCoggon with response to DOJ letter re our privilege logs (1.0).	5.20	650.00
11/01/02	DD	Review and organize data re EPA sampling in Libby to support statement of facts and expert review.	0.60	66.00
11/01/02	AH	Review, categorize and code documents produced by EPA for reference to various case issues.	7.90	790.00

December 24, 2002

W.R. Grace

Page 18  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

**Itemized Services**

Date	Tkpr	Description	Hours	Value
11/01/02	KLK	Review progress reports, log books, work plans, and other documents and create timeline of activities at Libby sites (6.60); conference call with LBrown, KJCoggon and JLSherman re Libby timeline (.40).	7.00	875.00
11/01/02	MCL	Review and organize data re EPA sampling in Libby to support statement of facts and expert review (3.50).	3.50	437.50
11/01/02	JLS	Review, categorize and code Boulder cost recovery documents for relevance to various case issues (1.30); conferences with NKAberle re various case issues including previous privilege logs and sampling data (0.40); conferences with LCStreet re status of scanning Boulder boxes (0.40); telephone conference with LBrown re database (0.30); conference call with LBrown, KJCoggon and KLKinnear re Libby timeline (0.40); conferences with KLKinnear re same (0.20); database research re same (0.80).	3.80	475.00
11/01/02	PRS	Conference with KWLund, LBrown and KJCoggon re CBI project (0.4); review and organize data re EPA sampling in Libby to support statement of facts and expert review (5.10); review Scheduling Order and Montana local rules re trial exhibits deadlines (0.8).	6.30	787.50
11/01/02	DRD	Review, categorize and code documents produced by EPA for relevance to various case issues.	8.30	498.00
11/01/02	LAM	Review and organize data re EPA sampling in Libby to support statement of facts and expert review (3.30); review, categorize and code documents produced by EPA for relevance to various case issues (3.30).	6.60	396.00
11/01/02	FP	Review and organize data re EPA sampling in Libby to support statement of fact and expert review.	4.50	315.00

December 24, 2002

W.R. Grace

Page 19  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

**Itemized Services**

Date	Tkpr	Description	Hours	Value
11/01/02	MBF	Review and organize data re EPA sampling in Libby to support statement of facts and expert review (2.80); review, categorize and code documents produced by EPA for relevance to various case issues (.80).	3.60	324.00
11/03/02	EES	Review Day 1 of Shapiro's deposition testimony re EPA's new indirect cost methodology in the Axel Johnson case (3.10); review Day 2 of Shapiro's deposition testimony in the Axel Johnson case (2.30).	5.40	1,512.00
11/03/02	LAM	Review and organize data re EPA sampling in Libby to support statement of facts and expert review.	8.00	480.00
11/04/02	LB	Conference call with Alan Stringer and Science staff (and for part, KJCoggon) re remedial actions (1.8); office conference with KWLund re trial (.20); telephone conference with graphics consultants (.20); meeting with EEStevenson re cost testimony (.80); follow up meeting with EEStevenson and KJCoggon re same (.20); office conferences with KJCoggon re various trial issues including findings of fact and exhibits (1.20); review and revise Betty Anderson direct examination (2.40).	6.80	2,720.00
11/04/02	KWL	Review and revise Finding of Fact and Conclusions of Law for submission to United States by November 18 (7.00); conference with LBrown re trial (.20); telephone conference with KJCoggon re case strategy, client conferences and budget issues (.80).	8.00	2,800.00
11/04/02	CLN	Review of Genuine Issues in Selection of Remedy brief (.30); draft summary of W. Hughson testimony for LBrown (1.20).	1.50	450.00
11/04/02	LSD	Conference with KJCoggon re Hutchinson information (.30).	0.30	90.00

December 24, 2002

W.R. Grace

Page 20  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

## Itemized Services

Date	Tkpr	Description	Hours	Value
11/04/02	KJC	Draft, review and edit findings of fact and conclusions of law (0.20); draft direct examination questions (0.30); address billing issues from team, vendors and experts (0.10); respond to questions from client and team re facts and documents (0.30); coordinate expert work including review and respond to e-mail and messages and telephone conferences with experts and counsel (0.20); address trial logistics and issues (0.20); attend portion of telephone conference with A. Stringer, Sciences International and LBrown re facts (1.10); telephone conferences with KWLund re case strategy, client conferences and budget (0.80); telephone conference with JAHall re drafting cross examinations (0.30); conference ATCrist re supplemental discovery responses (0.30) telephone conference with J. Stout re EPA activities in Libby (0.30); conferences with LBrown re witnesses, cost stipulation, documents, trial planning (1.20); research and draft one page witness summaries (1.70); address questions re data organization project (0.30).	7.30	2,007.50
11/04/02	EES	Draft summary of Wiley Wright's accounting opinions (2.20); review potential cost trial exhibits (3.40); review proposed stipulation re DOJ costs (.40); conference calls with accounting experts re findings of fact issues (.90); review additional DOT cost documentation (2.70).	9.60	2,688.00
11/04/02	CCC	Review, categorize and code documents produced by EPA for relevance to various case issues.	8.80	2,288.00
11/04/02	GMB	Review of Bartelt's expert report and deposition testimony (3.80).	3.80	836.00
11/04/02	ATC	Conference with KJCoggon re supplementing discovery requests (0.3); draft supplement to discovery requests (2.7).	3.00	525.00
11/04/02	JAH	Review discovery materials in preparation of cross-examinations for Meeker and Millette.	1.50	330.00

December 24, 2002

W.R. Grace

Page 21  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

**Itemized Services**

Date	Tkpr	Description	Hours	Value
11/04/02	NKA	Manage and provide substantive review re document coding issues (.50); review and organize data re EPA sampling in Libby to support statement of facts and expert review (3.50).	4.00	440.00
11/04/02	CKA	Review and organize data re EPA sampling in Libby to support statement of fact and expert review.	0.50	62.50
11/04/02	AEC	Review and organize data re EPA sampling in Libby to support statement of facts and expert review (6.20).	6.20	775.00
11/04/02	DD	Review and organize data re EPA sampling in Libby to support statement of facts and expert review.	4.00	440.00
11/04/02	AH	Review, categorize and code documents produced by EPA for reference to various case issues (3.50); review EPA data re Libby to support expert review (4.00).	7.50	750.00
11/04/02	KLK	Review progress reports, log books, work plans, and other documents and create timeline of activities at Libby sites (5.50).	5.50	687.50
11/04/02	MCL	Review and organize data re EPA sampling in Libby to support statement of facts and expert review (4.80).	4.80	600.00
11/04/02	JLS	Review and organize data re EPA sampling in Libby to support statement of facts and expert review (4.80).	4.80	600.00
11/04/02	PRS	Review and organize data re EPA sampling in Libby to support statement of facts and expert review (5.3).	5.30	662.50
11/04/02	DRD	Review, categorize and code documents produced by EPA for relevance to various case issues.	8.00	480.00
11/04/02	LAM	Review and organize data re EPA sampling in Libby to support statement of facts and expert review (4.20); review, categorize and code documents produced by EPA for relevance to various case issues (4.00).	8.20	492.00

December 24, 2002

W.R. Grace

Page 22  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

**Itemized Services**

Date	Tkpr	Description	Hours	Value
11/04/02	FP	Review and organize data re EPA sampling in Libby to support statement of fact and expert review.	6.00	420.00
11/04/02	MBF	Highlight arguments in response to summary judgment motion regarding CERCLA for LBrown (.50); review, categorize and code documents produced by EPA for relevance to various case issues (.50).	1.00	90.00
11/04/02	ICM	Search for background information on Nelson Shapiro including past testimony, publications, and speeches.	6.00	660.00
11/05/02	LB	Conferences with KJCoggon re trial (1.30); preparation for and meeting with potential trial presentation expert (1.50); review and revise direct examination of Betty Anderson (2.60).	5.40	2,160.00
11/05/02	KWL	Review and revise Findings of Fact and Conclusions of Law (6.0); review trial exhibits for Dodson and Horinko (1.0).	7.00	2,450.00
11/05/02	JDM	Prepare Lockey examination outline (1.7); prepare statement of facts (1.0); select trial exhibits (0.8); meeting with Litigation Abstract (1.5).	5.00	1,500.00
11/05/02	CLN	Draft summary of Hughson and Moolgavkar testimony including review of EPA September 2, 2002 response (7.5); conference with LBrown re winchite and richerite (.30); conference with D. Kuchinsky re case series and Whitehouse deposition (.20).	8.00	2,400.00
11/05/02	KJC	Draft direct examination questions (1.30); address trial logistics and issues (0.20); telephone conference with M. Grummer re useful deposition and materials from fraudulent conveyance action (0.40); telephone conference with R. Finke re status of case and R.J. Lee issues (0.20); address questions re data organization project (0.30); conferences with LBrown re facts, logistics and trial preparation generally (1.30); conference with potential trial presentation expert (2.00).	5.70	1,567.50

December 24, 2002

W.R. Grace

Page 23  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

**Itemized Services**

Date	Tkpr	Description	Hours	Value
11/05/02	EES	Draft summary of Dale Jensen's trial testimony (1.80); review additional potential trial cost exhibits (2.90); begin preparation of demonstrative cost exhibits (2.40); complete deposition testimony summary for Wiley Wright (EPA direct cost expert) (1.60).	8.70	2,436.00
11/05/02	CCC	Review, categorize and code documents produced by EPA for relevance to various case issues.	7.50	1,950.00
11/05/02	GMB	Preparation of direct exam outline for expert witness Richard Bartelt (8.10).	8.10	1,782.00
11/05/02	ATC	Draft supplemental response to discovery requests.	2.80	490.00
11/05/02	JAH	Review expert reports and depositions of Meeker and Millette for trial preparation.	9.00	1,980.00
11/05/02	NKA	Review and organize data re EPA sampling in Libby to support statement of facts and expert review (2.70); arrange for blowbacks of 1st Supplemental Production in Response to US Discovery Requests with copy vendor (.40).	3.10	341.00
11/05/02	AEC	Review and organize data re EPA sampling in Libby to support statement of facts and expert review (5.00); research database to find documents for use in expert direct testimony (2.30).	7.30	912.50
11/05/02	DD	Review and organize data re EPA sampling in Libby to support statement of facts and expert review.	5.50	605.00
11/05/02	AH	Review and organize data re EPA sampling in Libby to support statement of facts and expert review (8.00).	8.00	800.00
11/05/02	KLK	Review progress reports, log books, work plans, and other documents and create timeline of activities at Libby sites (6.00).	6.00	750.00

December 24, 2002

W.R. Grace

Page 24  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

**Itemized Services**

Date	Tkpr	Description	Hours	Value
11/05/02	MCL	Review and organize data re EPA sampling in Libby to support statement of facts and expert review (5.50).	5.50	687.50
11/05/02	JLS	Review and organize data re EPA sampling in Libby to support statement of facts and expert review (5.90); load fraudulent conveyance depositions in LiveNote (2.00).	7.90	987.50
11/05/02	PRS	Review and organize data re EPA sampling in Libby to support expert review (3.00).	3.00	375.00
11/05/02	DRD	Review, categorize and code documents produced by EPA for relevance to various case issues.	8.30	498.00
11/05/02	SCH	E-mail memorandum from CLNeitzel re document requests; database research and document review, and distribution of requested documents (0.50); database coding, update database coding, maintenance and filing of documents (6.00)	0.00	0.00
11/05/02	LAM	Review and organize data re EPA sampling in Libby to support statement of facts and expert review.	7.30	438.00
11/05/02	FP	Review and organize data re EPA sampling in Libby to support statement of fact and expert review.	0.50	35.00
11/05/02	MBF	Review and organize data re EPA sampling in Libby to support statement of facts and expert review (3.30); review, categorize and code documents produced by EPA for relevance to various case issues (1.00).	4.30	387.00
11/05/02	ICM	Review and summarize material and generate chart re Nelson Shapiro's testimony as per EESTevenson's request.	1.40	154.00
11/06/02	LB	Prepare for and attend meetings with Lev Ropes re graphics and with Ken Spitze re aerial photos (3.80); telephone conference with KJCoggon re same (.40).	4.20	1,680.00
11/06/02	JDM	Prepare Lockey cross (1.2); prepare statement of facts (0.6); select trial exhibits (0.4).	2.20	660.00

December 24, 2002

W.R. Grace

Page 25  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

## Itemized Services

Date	Tkpr	Description	Hours	Value
11/06/02	CLN	Prepare summary of Moolgavkar and Hughson testimony (.80).	0.80	240.00
11/06/02	KJC	Draft, review and edit findings of fact and conclusions of law (1.30); draft and revise direct examination questions (0.50); address billing issues from team, vendors and experts (0.40); respond to questions from client and team re facts and documents (0.20); review and respond to e-mail and follow up on document production from EPA (0.20); address trial logistics and issues (0.20); telephone conference with G.Graham re exhibits and tasks (0.40); conference with JLSherman, NKAberle, AECarroll re trial exhibits (1.00); telephone conference with D. Van Orden and L. Lockrem re Lee exhibits (0.80); telephone conferences with EEStevenson, D. Jensen and K. Fessler re exhibits and deadlines (0.30); draft one page Meeker summary (0.20); address data organization project issues (0.30); draft response to DOJ re privilege logs (0.60); telephone conference with LBrown re status of projects (0.40); telephone conferences with W. Corcoran re trial options (0.40); telephone conference with J. Freeman re exhibits, pretrial conference and related items (0.40).	7.60	2,090.00
11/06/02	EES	Complete summary of Nelson Shapiro's indirect cost testimony summary (1.10); meet with accounting experts re exhibits and trial preparation (3.00); draft deposition designations for the testimony of Charles Young (EPA indirect cost expert) (2.70).	6.80	1,904.00
11/06/02	CCC	Review, categorize and code documents produced by EPA for relevance to various case issues.	6.50	1,690.00
11/06/02	GMB	Preparation of direct exam outline for expert witness Richard Bartelt (7.40).	7.40	1,628.00
11/06/02	ATC	Meet with JAHall re ATSDR findings for supplemental responses to discovery requests (.5); draft supplemental responses to discovery requests (2.3).	2.80	490.00

December 24, 2002

W.R. Grace

Page 26  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

## Itemized Services

Date	Tkpr	Description	Hours	Value
11/06/02	JAH	Review expert reports and depositions of Meeker and Millette for trial preparation (4.50); prepare cross-examination outline for Meeker (3.00); conference with ATCrist re supplemental discovery responses (.80).	8.30	1,826.00
11/06/02	NKA	Review and organize data re EPA sampling in Libby to support statement of facts and expert review (3.30); office meeting with KJCoggon, JLSherman, and AECarroll re upcoming schedule, trial preparation and strategy (1.00); create Excel spreadsheet to be used on master trial exhibit list per KJCoggon's request (2.20); verify Administrative Record numbers with images and descriptions (.80).	7.30	803.00
11/06/02	CKA	Review and organize data re EPA sampling in Libby to support statement of fact and expert review.	7.00	875.00
11/06/02	AEC	Conference with KJCoggon, NKAblerle and JLSherman re preparation of trial exhibit list (1.00); create chart of potential trial witnesses and responsible attorneys (0.80); review and organize data re EPA sampling in Libby to support statement of facts and expert review (5.50).	7.30	912.50
11/06/02	DD	Review and organize data re EPA sampling in Libby to support statement of fact and expert review.	2.50	275.00
11/06/02	AH	Review and code electronic trade secret documents to substantiate and waive CBI claims in response to EPA demand letter.	3.50	350.00
11/06/02	KLK	Review progress reports, log books, work plans, and other documents and create timeline of activities at Libby sites (6.00).	6.00	750.00
11/06/02	MCL	Review and organize data re EPA sampling in Libby to support statement of facts and expert review (3.20).	3.20	400.00
11/06/02	JLS	Review and organize data re EPA sampling in Libby to support statement of facts and expert review (8.9).	8.90	1,112.50

December 24, 2002

W.R. Grace

Page 27  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

**Itemized Services**

Date	Tkpr	Description	Hours	Value
11/06/02	PRS	Review and organize data re EPA sampling in Libby to support expert review (7.0).	7.00	875.00
11/06/02	DRD	Review, categorize and code documents produced by EPA for relevance to various case issues.	8.50	510.00
11/06/02	SCH	Database coding, update database coding and maintenance of documents.	0.00	0.00
11/06/02	LAM	Review, categorize and code documents produced by EPA for relevance to various case issues.	8.00	480.00
11/06/02	FP	Review and organize data re EPA sampling in Libby to support statement of fact and expert review.	5.80	406.00
11/06/02	MBF	Research and obtain orders from cases listed in designation of rebuttal expert, Nelson Shapiro (3.30).	3.30	297.00
11/06/02	ICM	Search for opinions, pleadings, and orders in various cases identified by rebuttal expert (3.50); review, summarize and generate chart re Nelson Shapiro's testimony as per EESTevenson's request (3.00).	6.50	715.00
11/07/02	LB	Office conferences with KJCoggon re Bartelt and Peronard exhibits and testimony (.90); conference call with KJCoggon, Rich Bartelt, and Frank Jones re exhibits and testimony (.60); office conferences with KJCoggon re trial preparation issues (.50); Grace team meeting re trial preparation (1.40); review documents for potential designation as trial exhibits (4.10).	7.50	3,000.00
11/07/02	CLN	Attend portion of Grace meeting re trial preparation (1.0); telephone conference with D. Kuchinsky re request for depositions (.30).	1.30	390.00

December 24, 2002

W.R. Grace

Page 28  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

**Itemized Services**

Date	Tkpr	Description	Hours	Value
11/07/02	KJC	Draft, review and edit findings of fact and conclusions of law (1.30); draft and revise direct examination questions (0.40); address billing issues from team, vendors and experts (0.10); address inquiries and issues re document databases (0.10); respond to questions from client and team re facts and documents (0.60); coordinate expert work including review and respond to e-mail and messages and telephone conferences with experts and counsel (0.80); address trial logistics and issues (0.30); attend portion of Grace meeting re trial preparation (1.00); conferences with LBrown re various issues (1.30); telephone conference with EESTevenson re trial prep assignments (0.20); address trial exhibit list issues (1.10); telephone conference with J. Freeman re deposition proffers (0.20); telephone conference with LBrown, R. Bartelt and F. Johns re exhibits (0.60); review draft Meeker cross-examination (0.40); draft Millette one page summary (0.30).	8.70	2,392.50
11/07/02	EES	Attend portion of Grace meeting re trial preparation (1.00); review Day 1 and 2 of Timothy Wall's (CDM) deposition testimony and draft trial deposition proffers (3.90); review William Hurley's (ECC) deposition testimony and prepare trial deposition proffers (2.90); phone conferences with accounting expert re exhibit issues (.80).	8.60	2,408.00
11/07/02	CCC	Review, categorize and code documents produced by EPA for relevance to various case issues.	8.50	2,210.00
11/07/02	GMB	Preparation of cross-exam outline for DOJ's expert witness Thomas Dahl (8.40).	8.40	1,848.00
11/07/02	ATC	Draft supplemental responses to discovery requests.	4.10	717.50

December 24, 2002

W.R. Grace

Page 29  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

**Itemized Services**

Date	Tkpr	Description	Hours	Value
11/07/02	JAH	Prepare cross-examination outline for Meeker (6.60); conference with KJCoggon re same (.50); review discovery materials in preparation of Meeker cross-examination outline (.30); consider and prepare cross-examination outline for Millette (1.00); review discovery material in preparation of same (1.00).	9.40	2,068.00
11/07/02	NKA	Attend portion of Grace meeting re trial preparation (1.00); adjust master trial exhibit list to include further information re will/may call status (.70); review and organize data re EPA sampling in Libby to support statement of facts and expert review (4.60); search for and locate exhibits from briefs re 2nd and 3rd affirmative defenses per ATCrist's request (.60); manage and provide substantive review re document coding issues (.40).	7.30	803.00
11/07/02	AEC	Trial team meeting re upcoming issues and schedule (1.00); review and organize data re EPA sampling in Libby to support statement of facts and expert review (6.20).	7.20	900.00
11/07/02	DD	Review and organize data re EPA sampling in Libby to support statement of fact and expert review (2.8).	2.80	308.00
11/07/02	AH	Review and organize data re sampling in Libby to support statement of fact and expert review (6.50).	6.50	650.00
11/07/02	KLK	Review progress reports, log books, work plans, and other documents and create timeline of activities at Libby sites (6.00).	6.00	750.00
11/07/02	JLS	Review and organize data re EPA sampling in Libby to support statement of facts and expert review (5.60); database research re depositions for ERita review (1.80); attend portion of Grace meeting re trial preparation (1.00)	8.40	1,050.00
11/07/02	PRS	Review and organize data re EPA sampling in Libby to support expert review (4.6).	4.60	575.00

December 24, 2002

W.R. Grace

Page 30  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

**Itemized Services**

Date	Tkpr	Description	Hours	Value
11/07/02	DRD	Review, categorize and code documents produced by EPA for relevance to various case issues.	8.00	480.00
11/07/02	SCH	E mail memoranda from CLNeitzel, NK Aberle, and KBCarnes re document requests and inquiries, database research and document review, distribution of requested documents and respond to inquiries.	0.00	0.00
11/07/02	LAM	Review, categorize and code documents produced by EPA for relevance to various case issues.	7.20	432.00
11/07/02	FP	Review and organize data re EPA sampling in Libby to support statement of fact and expert review.	5.90	413.00
11/07/02	MBF	Research regarding litigation support provided by EPA experts Nelson Shapiro and Henry Anderson, M.D. (5.00).	5.00	450.00
11/08/02	LB	Review and select potential Peronard trial exhibits (8.60).	8.60	3,440.00
11/08/02	CGH	Review of case documents and designate trial exhibits (9.80).	9.80	3,430.00
11/08/02	KJC	Draft, review and edit findings of fact and conclusions of law (1.40); draft direct examination questions and power point slides (3.80); address billing issues from team, vendors and experts (0.20); address inquiries and issues re document databases (0.30); respond to questions from client and team re facts and documents (1.60); address trial logistics and issues (0.40); draft one page witness summaries (0.80).	8.50	2,337.50
11/08/02	EES	Strategy meeting with accounting experts re demonstrative cost trial exhibits (2.70); review Volume 1 of John McGuiggan's (DOT) deposition testimony for potential trial cost exhibits and use in cross-examination (2.90); review revised draft demonstrative cost trial exhibits (1.80)	7.40	2,072.00
11/08/02	GMB	Edit direct exam outline of Richard Bartelt and cross-exam outline for DOJ's expert witness Thomas Dahl (6.60).	6.60	1,452.00

December 24, 2002

W.R. Grace

Page 31  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

**Itemized Services**

Date	Tkpr	Description	Hours	Value
11/08/02	ATC	Revise supplemental responses to discovery requests (3.5); research re objections to administrative record documents (2.7).	6.20	1,085.00
11/08/02	JAH	Conference with KJCoggon re preparation of cross-examination outlines (.40); review materials in preparation of cross-examination outline of Millette (1.00); consider and prepare cross-examination outline for Millette (2.00).	3.40	748.00
11/08/02	NKA	Review and organize data re EPA sampling in Libby to support statement of facts and expert review (5.50); edit and update master exhibit list and transmit copy for reference by expert (.30); compile ATSDR documents for D. Kuchinsky per CLNeitzel's request (.40); research deviation sheets in Production database (1.00); research photographs produced by EPA for review by LBrown (1.10).	8.30	913.00
11/08/02	CKA	Review and organize data re EPA sampling in Libby to support statement of fact and expert review.	5.50	687.50
11/08/02	AEC	Review and organize data re EPA sampling in Libby to support statement of facts and expert review (6.00).	6.00	750.00
11/08/02	DD	Review and organize data re EPA sampling in Libby to support statement of facts and expert review (5.50)	5.50	605.00
11/08/02	KLK	Confer with CGHarris and LBrown re designating documents as exhibits (0.50); review documents for inclusion on Peronard Exhibit List and add to List (7.50).	8.00	1,000.00
11/08/02	JLS	Review and organize data re EPA sampling in Libby to support statement of facts and expert review (7.20).	7.20	900.00
11/08/02	PRS	Review and organize data re EPA sampling in Libby to support expert review (5.10)	5.10	637.50
11/08/02	DRD	Review, categorize and code documents produced by EPA for relevance to various case issues.	7.00	420.00

December 24, 2002

W.R. Grace

Page 32  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

**Itemized Services**

Date	Tkpr	Description	Hours	Value
11/08/02	SCH	Conference with MBFloyd re document request and inquiries; database research and document review, and respond to inquiries (3.00); database coding, update database coding and maintenance of documents (2.00).	0.00	0.00
11/08/02	FP	Review and organize data re EPA sampling in Libby to support statement of fact and expert review.	7.20	504.00
11/08/02	LCS	Review, categorize and code documents for relevance to case issues.	7.50	637.50
11/08/02	MBF	Search Administrative Record and other Grace databases as part of trial exhibit preparation to determine which items listed on the Administrative Record must be requested from EPA (5.30).	5.30	477.00
11/09/02	KWL	Review and revise draft case strategy memo (3.0).	3.00	1,050.00
11/09/02	EES	Review Missy Koppelman's (ATSDR) deposition testimony (2.30); review Volume I of Daniel Figueroa's (Marcor) deposition testimony (2.40); review Volume II of Daniel Figueroa's deposition testimony (2.80).	7.50	2,100.00
11/09/02	FP	Review and organize data re EPA sampling in Libby to support statement of fact and expert review.	5.50	385.00
11/09/02	MBF	Search Administrative Record and other Grace databases as part of trial exhibit preparation to determine which items listed on the Administrative Record must be requested from EPA (3.60); draft memorandum regarding results of search (.40).	4.00	360.00
11/10/02	LB	Draft settlement statement for Bill Corcoran (2.10); conference with KJCoggon re status of case projects (.30).	2.40	960.00
11/10/02	CLN	Review and revise direct examination for W. Hughson.	3.00	900.00

December 24, 2002

W.R. Grace

Page 33  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

**Itemized Services**

Date	Tkpr	Description	Hours	Value
11/10/02	KJC	Revise direct examination questions (1.90); review, edit and discuss with LBrown white paper on settlement (0.70); conference with LBrown re status of case projects (0.30); review and respond to e-mail re documents and other facts (0.30).	3.20	880.00
11/10/02	EES	Review Kathy Kirkland's (ATSDR costs) deposition testimony (1.90).	1.90	532.00
11/10/02	ATC	Revise supplemental responses to discovery requests.	2.10	367.50
11/10/02	JAH	Consider and prepare cross-examination outline for Millette.	2.00	440.00
11/10/02	JLS	Review, categorize and code documents produced by EPA for relevance to various case issues (0.50); database research re EPA pollution reports for use as trial exhibits (0.40)	0.90	112.50
11/11/02	LB	Review videotapes and other potential trial exhibits for selection (4.20); office conferences with KJCoggon re trial exhibits and other issues (.70).	4.90	1,960.00
11/11/02	KWL	Review World Trade Center documents and various export plant work documents for possible inclusion on exhibit list (5.0); review US' reply briefs on motions for Summary Judgement (2.00).	7.00	2,450.00
11/11/02	JDM	Review and select trial exhibits (3.5); prepare Lockey cross (0.9); prepare findings of fact (0.4); prepare for telephone conference with client and medical experts re ATSDR study (0.5); telephone conference with client, KJCoggon and medical experts re ATSDR study (0.8).	6.10	1,830.00
11/11/02	CLN	Conference with MBFloyd re Administrative Record target sheets (.30); conference with Richard Finke re Hughson testimony (.20); review and revise Hughson direct testimony, including review of report, deposition, and EPA comments (9.5); conference with D. Kuchinsky, D. Cameron, L. Flatley and R. Senfleben re Hughson testimony (1.0).	11.00	3,300.00

December 24, 2002

W.R. Grace

Page 34  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

**Itemized Services**

Date	Tkpr	Description	Hours	Value
11/11/02	KJC	Draft, review and revise direct and cross-examination questions for trial (1.40); respond to questions from client and team re facts and documents (0.80); coordinate expert work including review and respond to e-mail and messages and telephone conferences with experts and counsel (0.40); address trial logistics and issues (0.70); telephone conference with R. Bartelt and F. Johns re exhibits (0.90); telephone conference with W. Corcoran et al re statistical and other errors in ATSDR studies (0.80); telephone conference with EESTevenson, D. Jensen and K. Fessler re exhibits (0.20); review ATSDR reports (0.30); address questions and issues re exhibit lists (1.20); telephone conferences with J. Freeman re pleadings and missing documents (0.30); telephone conference with G. Graham re exhibit list and witnesses (0.50); conferences with LBrown re exhibits, other trial issues (0.70).	8.20	2,255.00
11/11/02	EES	Review additional Marcor, CDM and ECC cost documentation for potential designation as trial exhibits (4.30); meet with accounting experts re additional demonstrative exhibits and additional cost documentation exhibit designations (3.20); review additional McGuiggin deposition testimony for deposition proffer designation and additional trial exhibits (2.60).	10.10	2,828.00
11/11/02	GMB	Additional research for Bartelt direct exam outline (3.40); additional research for Dahl cross exam outline (2.20); edit Bartelt direct exam outline (1.90).	7.50	1,650.00
11/11/02	ATC	Revise supplemental response to discovery requests (3.7); research re objections to documents in administrative record (2.8).	6.50	1,137.50
11/11/02	JAH	Review materials in preparation of cross-examination outline for Millette (2.00); consider and prepare cross-examination outline for Millette (5.00).	7.00	1,540.00

December 24, 2002

W.R. Grace

Page 35  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

## Itemized Services

Date	Tkpr	Description	Hours	Value
11/11/02	BAT	Research requirements to serve trial subpoenas and to quash same.	3.10	744.00
11/11/02	NKA	Research photographs and audio/visual references for review by LBrown (1.90); prepare exhibit list including review of documents for potential listing (3.80); review and organize data re EPA sampling in Libby to support statement of facts and expert review (1.20).	6.90	759.00
11/11/02	AEC	Review documents for potential use as trial exhibits (5.4); conference with NKABerle and JLSherman re trial preparation tasks (0.5); database research re rebuttal expert Henry Anderson (1.2).	7.10	887.50
11/11/02	DD	Review and organize data re EPA sampling in Libby to support statement of facts and expert review (5.2).	5.20	572.00
11/11/02	JLS	Review documents for potential use as trial exhibits (8.30); conference with NKABerle and AECarroll re trial preparation tasks and assignments (0.50); conference with KJCoggon re same (0.30); database research re EPA pollution reports (0.60);	9.70	1,212.50
11/11/02	PRS	Review and organize data re EPA sampling in Libby to support expert review (1.3).	1.30	162.50
11/11/02	SCH	E-mail memoranda from CLNeitzel, NKABerle and KBCarnes re document requests and inquiries; database research and document review, copy and distribute requested documents and respond to inquiries (1.0); database coding, update database coding and maintenance of documents (6.50).	0.00	0.00
11/11/02	FP	Review and organize data re EPA sampling in Libby to support statement of fact and expert review.	7.25	507.50

December 24, 2002

W.R. Grace

Page 36  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

**Itemized Services**

Date	Tkpr	Description	Hours	Value
11/11/02	MBF	Conference with CLNeitzel regarding obtaining items missing from Administrative Record (.30); conference with KJCoggon regarding obtaining items missing from Administrative Record (.30); obtain complete set of Public Health conference videos for review by LBrown and prepare summary of first six videos (.30); double-check and revise index of items missing from Administrative Record (1.50); research for JDMcCarthy regarding expert Henry Anderson (1.00)	3.40	306.00
11/12/02	LB	Conference call with Alan Stringer and KJCoggon re factual background and preparation for testimony (1.30); review KJCoggon summary re R.J. Lee and Eric Chatfield and draft presentation re Lee (.80); office conference with JDMcCarthy and KJCoggon re trial preparation (.50); telephone conference with Gary Graham, KJCoggon, and JDMcCarthy re rebuttal and impeachment trial exhibits and other trial preparation (.20); review United States reply briefs (.50); telephone conference with Bill Corcoran and David Siegel re same (.20); telephone conference with Betty Anderson and Rick Reiss re testimony and trial (.30); review Peronard documents for potential trial exhibits (.70).	4.50	1,800.00
11/12/02	KWL	Draft witness summaries for Hutchinson, Dodson and Horinko (5.00); telephone conference with Bill Corcoran re case status and strategy (.40).	5.40	1,890.00
11/12/02	JDM	Review Anderson index (0.3); prepare Lockett cross examination outline (2.3); prepare trial exhibits (2.6); prepare findings of fact (2.1); review revised cost analysis and conference with EEStevenson re same (0.5); telephone conference with Gary Graham, KJCoggon, and LBrown re rebuttal and impeachment trial exhibits and other trial preparation (.20); conference with LBrown and KJCoggon re trial preparation issues (0.5).	8.50	2,550.00

December 24, 2002

W.R. Grace

Page 37  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

## Itemized Services

Date	Tkpr	Description	Hours	Value
11/12/02	CLN	Prepare direct testimony of W. Hughson (3.80); prepare direct testimony for S. Moolgavkar and W. Hughson and evaluate exhibits relating to testimony and prepare exhibit for S. Moolgavkar (7.20)	11.00	3,300.00
11/12/02	KJC	Draft, review and revise direct and cross-examination questions for trial (0.30); respond to questions from client and team re facts and documents (0.20); address trial logistics and issues (0.20); telephone conference with LBrown and A. Stringer re facts (1.30); conference with LBrown and JDMcCarthy re exhibits and other case projects (0.50); telephone conference with Gary Graham, LBrown and JDMcCarthy re rebuttal and impeachment trial exhibits and other trial preparation (.20); telephone conference with D. Van Orden re exhibits (0.60); telephone conference with R. Bartelt re exhibits (0.30); conference with JAHall re exhibits (0.40); review key documents for potential addition to exhibit list (5.20).	9.20	2,530.00
11/12/02	EES	Review revised demonstrative exhibits (2.30); prepare Wiley Wright cross-examination documentation (1.20); review Figueroa trial exhibit designation (.70); conference with JDMcCarthy re revised cost analysis (.50); review CDM trial exhibit designations (1.40); designate Wilson (ATSDR) trial exhibits (1.10); designate Missy Koppelman (NORC) trial exhibits (1.60)	8.80	2,464.00
11/12/02	GMB	Additional research for Bartelt direct exam outline (4.50); additional research for Dahl cross exam outline (1.60); edit Bartelt direct exam outline (2.20).	8.30	1,826.00
11/12/02	ATC	Draft memo re objections to documents in administrative record (5.7); revise supplemental response to discovery requests (.5).	6.20	1,085.00

December 24, 2002

W.R. Grace

Page 38  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

**Itemized Services**

Date	Tkpr	Description	Hours	Value
11/12/02	JAH	Consider and prepare cross-examination outline for Millette (2.60); review and prepare exhibits for same (3.00); conference with KJCoggon re exhibits (.40).	6.00	1,320.00
11/12/02	BAT	Research and draft memo re issues with trial subpoenas.	7.20	1,728.00
11/12/02	NKA	Conference with SCHARaldson re location of various deposition transcripts and compile same per CLNeitzel's request (.60); prepare exhibit list including review of documents for potential listing (7.30).	7.90	869.00
11/12/02	AEC	Prepare exhibit list including review of documents for potential listings (5.8); update and review deposition exhibit notebooks (1.5).	7.30	912.50
11/12/02	DD	Review and organize data re EPA sampling in Libby to support statement of facts and expert review (.60).	0.60	66.00
11/12/02	JLS	Prepare exhibit list including review of documents for potential listing (10.10).	10.10	1,262.50
11/12/02	PRS	Review and organize data re EPA sampling in Libby to support expert review (2.6).	2.60	325.00
11/12/02	PRS	Conference with KJBates re exhibit lists and data sort projects to determine staffing needs (0.3).	0.30	37.50
11/12/02	SCH	E-mail memoranda from NKABerle, AECarroll re document requests and inquiries; database research and document review, distribution of requested documents and respond to inquiries (2.0); database coding, update database coding, maintenance and distribution of documents (3.50).	0.00	0.00
11/12/02	FP	Prepare exhibit list including review of documents for potential listing.	2.50	175.00
11/12/02	LCS	Review, categorize and code documents for relevance to case issues.	7.50	637.50

December 24, 2002

W.R. Grace

Page 39  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

**Itemized Services**

Date	Tkpr	Description	Hours	Value
11/12/02	MBF	Research and obtain articles to be used as trial exhibits for CLNeitzel and JDMcCarthy (1.90); research regarding missing items in Administrative Record (.60); ensure documents sent by Matt Cohn of EPA included in database (.50).	3.00	270.00
11/13/02	LB	Attend portion of meeting with Lev Ropes and KJCoggon re trial graphics (3.60); attend portion of meeting with Lev Ropes, KJCoggon, and JDMcCarthy re summary exhibits and trial graphics (2.60); office conference with KJCoggon and JDMcCarthy re trial exhibits (.70); telephone conference with Bob Emmett re United States reply briefs (.50); office conference with KJCoggon re status of various trial preparation projects (.30); review documents for selection as potential trial exhibits (2.90); office conference with CLNeitzel and JDMcCarthy re trial exhibits, Hughson, Moolgavkar and related issues (.40) and follow up office conference with JDMcCarthy re same (.20); telephone conference with KWLund re case status and issues (.30); meeting with WBrown and KJCoggon re slope factor and ATSDR graphics (.50); telephone conference with Rick Reiss re trial exhibits (.20); office conference with EEStevenson re strategy re trial exhibits (.40).	12.60	5,040.00
11/13/02	KWL	Review documents for inclusion in trial exhibit list (3.50); review Weis deposition transcript for purpose of developing trial cross examination (1.20); telephone conference with LBrown re case status and issues (.30); telephone conference with KJCoggon re trial preparation status (.50).	5.50	1,925.00

December 24, 2002

W.R. Grace

Page 40  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

## Itemized Services

Date	Tkpr	Description	Hours	Value
11/13/02	JDM	Meet with JLSherman re exhibits and database (0.3); review draft Hughson outline (0.9); meet with LBrown re Hughson outline (0.2); review Hughson report (0.4); meet with LBrown and CLNeitzel re Hughson outline (0.4); review ATSDR summaries re Mortality Study and Screening Study (0.7); outline ATSDR issues for LBrown (0.7); review Anderson report and articles cited therein (1.5); review Brody deposition, report and articles (0.2); meet with trial exhibit consultant, LBrown, KJCoggon re demonstration exhibits (2.9); meet with WBrown re ATSDR exhibits (0.5); prepare ATSDR exhibit drafts (0.9); meet with LBrown re demonstrative exhibits, trial exhibits (0.6); meet with CLNeitzel re Hughson outline and exhibits (0.7).	10.90	3,270.00
11/13/02	CLN	Prepare direct for W. Hughson and S. Moolgavkar and review and revise exhibits for testimony and for pretrial order (9.30); meet with JDMcCarthy re Hughson outline and exhibits (0.7).	10.00	3,000.00
11/13/02	KJC	Address billing issues from team, vendors and experts (0.20); respond to questions from client and team re facts and documents (0.20); coordinate expert work including review and respond to e-mail and messages and telephone conferences with experts and counsel (0.30); address trial logistics and issues (0.20); conference with LBrown and Lev Ropes re demonstrative exhibits and other trial graphics (3.90); telephone conferences with D. Van Orden re exhibits and Lee testimony (1.30); telephone conference with R. Bartelt re exhibits (0.40); review and comment on memorandum re administrative record document objections (0.40); conferences with LBrown, JDMcCarthy and Lev Ropes re exhibits (3.10); conferences with LBrown re potential exhibits and trial strategies (0.30); telephone conference with KWLund re trial preparation status (0.50); address questions re exhibits (0.80); review documents for potential designation as exhibits (0.80).	12.40	3,410.00

December 24, 2002

W.R. Grace

Page 41  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

**Itemized Services**

Date	Tkpr	Description	Hours	Value
11/13/02	EES	Revise and add new cost demonstrative exhibits (4.80); conference calls with accounting experts re demonstrative exhibits (1.60); meet with LBrown re exhibit issues (.40); prepare additional indirect cost demonstrative exhibits (2.20); review revised cost document trial exhibit designations (1.60).	10.60	2,968.00
11/13/02	GMB	Additional research for Bartelt direct exam outline (1.40); additional research for Dahl cross exam outline (1.60); edit Bartelt direct exam outline (1.20); research on exhibits for Bartelt direct exam outline (2.40); research on exhibits for Dahl cross exam outline (1.50).	8.10	1,782.00
11/13/02	ATC	Draft memo re objections to documents in administrative record.	6.00	1,050.00
11/13/02	JAH	Prepare cross-examination outline for Millette (3.00); review and prepare exhibits for same (1.00); review and prepare exhibits for Meeker cross-examination (1.00).	5.00	1,100.00
11/13/02	BAT	Research and draft memo re issues with trial subpoenas.	2.50	600.00
11/13/02	NKA	Prepare exhibit list including review of documents for potential listing (9.70); conference with MCLatuda, PRStacey, JLSherman, and AECarroll re upcoming schedule, trial preparation, and status of exhibit list (1.00).	10.70	1,177.00
11/13/02	CKA	Database document review for Libby downtown air samples.	7.00	875.00
11/13/02	AEC	Prepare exhibit list including review of documents for potential listings (4.8); database research re rebuttal expert Henry Anderson (1.8); conference with MCLatuda, PRStacey, JLSherman, and NKABerle re upcoming schedule, trial preparation, and status of exhibit list (1.00).	7.60	950.00
11/13/02	KLK	Review documents and add to Peronard Exhibit List if relevant (6.00).	6.00	750.00

December 24, 2002

W.R. Grace

Page 42  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

## Itemized Services

Date	Tkpr	Description	Hours	Value
11/13/02	MCL	Prepare exhibit list including review of documents for potential listing (3.90).	3.90	487.50
11/13/02	JLS	Prepare exhibit list including review of documents for potential listing (10.90); conferences with NKAberle, MCLatuda, PRStacey and AECarroll re same (1.00).	11.90	1,487.50
11/13/02	SCH	Database coding, update database coding, maintenance of documents.	0.00	0.00
11/13/02	LCS	Review, categorize and code documents for relevance to case issues.	5.50	467.50
11/13/02	MBF	Complete review of administrative record for missing items in preparation for trial exhibit list (.80),	0.80	72.00
11/14/02	LB	Travel from Denver to San Diego (1.00) (1.00 N/C) (NWT 50%); conference with CLNeitzel re position re Screening and Mortality Studies (2.00); review part of one photo CD for selection of trial exhibits (.30); meeting with Dr. Hughson, Rick Senfleben, and CLNeitzel re trial testimony (3.00); confer with CLNeitzel re S. Moolgavkar direct testimony (.50); travel from San Diego to Denver (1.00) (1.00 N/C) (NWT 50%).	7.80	3,120.00
11/14/02	JDM	Telephone conference with LBrown re demonstrative exhibits (0.1); revise demonstrative exhibits (1.8); revise additional exhibits (0.6); review EPA production database for trial exhibits (4.3); conferences with KJCoggon and WBrown re graphics for trial exhibits (1.30).	8.10	2,430.00
11/14/02	CLN	Travel to San Diego (1.00) (1.00 N/C) (NWT 50%); conference with LBrown re mortality and screening studies (2.00); meet with W. Hughson and R. Senfleben (3.00); review and revise Moolgavkar testimony and confer with LBrown re Moolgavkar testimony (.80); travel to Denver (1.00) (1.00 N/C) (NWT 50%)	7.80	2,340.00

December 24, 2002

W.R. Grace

Page 43  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

**Itemized Services**

Date	Tkpr	Description	Hours	Value
11/14/02	KJC	Respond to questions from client and team re facts and documents (0.70); address trial logistics and issues (0.30); telephone conference with J. Freeman re exhibits and logistics for pretrial conference (0.30); telephone conference with J. Roeder re attic insulation investigation costs (0.30); telephone conference with D. Van Orden re exhibits and presentation (0.20); conference with GMBarry re Bartelt exhibits (0.20); conference with ATCrist re research projects (0.30); review documents for potential addition to exhibit list (0.80); address issues re exhibit list (0.40); conferences with JDMcCarthy and WBrown re graphics for trial exhibits (1.30).	4.80	1,320.00
11/14/02	EES	Prepare deposition testimony proffer for Colette Wilson (ATSDR indirect costs) (3.40).	3.40	952.00
11/14/02	GMB	Research on exhibits for Bartelt direct exam outline (6.10); draft summary exhibit for Bartelt direct exam (.40); edit Bartelt direct exam outline (.70).	7.20	1,584.00
11/14/02	ATC	Revise memo re objections to documents in administrative record.	3.50	612.50
11/14/02	IAH	Review Rich Lee deposition and other materials in preparation of Millette cross-examination outline (1.50); perform legal research re ATSDR authority (.50); review administrative record materials re various USGS studies (4.30).	6.30	1,386.00
11/14/02	BAT	Research and draft memo re issues with trial subpoenas.	3.70	888.00
11/14/02	NKA	Prepare exhibit list including review of documents for potential listing (5.50); research and review of Libby interviews per KJCoggon's request (3.10).	8.60	946.00
11/14/02	CKA	Database document review for Libby downtown air samples.	4.00	500.00

December 24, 2002

W.R. Grace

Page 44  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

**Itemized Services**

Date	Tkpr	Description	Hours	Value
11/14/02	AEC	Prepare exhibit list including review of documents for potential listings (6.4); conference with NK Aberle and JLSherman re trial exhibit list tasks (1.3).	7.70	962.50
11/14/02	KLK	Review documents and add relevant items to Peronard Exhibit List (5.00).	5.00	625.00
11/14/02	MCL	Prepare exhibit list, including review of documents for potential listing (10.60).	10.60	1,325.00
11/14/02	JLS	Prepare exhibit list including review of documents for potential listing (9.80); conferences with NK Aberle, MCLatuda, AECarroll and PRStacey re same (1.30).	11.10	1,387.50
11/14/02	PRS	Review documents for potential use as trial exhibits and prepare draft exhibit list (2.6).	2.60	325.00
11/14/02	SCH	Database coding, update database coding, maintenance and distribution of documents.	0.00	0.00
11/14/02	LCS	Review, categorize and code documents for relevance in case issue.	2.00	170.00
11/14/02	MBF	Obtain article for JDMcCarthy in preparation for trial exhibit list (.30).	0.30	27.00
11/14/02	ICM	Prepare trial notebooks on the theory of the case for KJCoggon.	3.50	385.00
11/15/02	KWL	Review documents for inclusion in trial exhibit list (5.0).	5.00	1,750.00
11/15/02	JDM	Revise demonstrative exhibits (0.2); review supplemental interrogatory responses (0.2); review government production for trial exhibits (5.8).	6.20	1,860.00

December 24, 2002

W.R. Grace

Page 45  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

**Itemized Services**

Date	Tkpr	Description	Hours	Value
11/15/02	KJC	Telephone conference with R. Emmett re status of case projects, schedule and client meeting (0.50); telephone conference with KWLund re case projects and schedule (0.30); telephone conference with JLSherman, NKAberle and AECarroll re trial exhibit list preparation (0.40); draft agenda for client meeting (0.50).	1.70	467.50
11/15/02	GMB	Research on exhibits for Bartelt direct exam outline (7.10).	7.10	1,562.00
11/15/02	ATC	Revise memo re objections to documents in administrative record (5.7); prepare supplemental responses to interrogatories for service (0.5).	6.20	1,085.00
11/15/02	JAH	Prepare revisions to Millette cross-examination outline.	2.80	616.00
11/15/02	NKA	Prepare exhibit list including review of documents for potential listing (5.50); conference call with KJCoggon, JLSherman and AECarroll re trial exhibit list (.40); work with SCHaraldson re coding of WRG10 million documents (2.00).	7.90	869.00
11/15/02	CKA	Database document review for Libby downtown air samples.	7.70	962.50
11/15/02	AEC	Prepare exhibit list including review of documents for potential listings (3.3); conference call with KJCoggon, NKAberle and JLSherman re trial preparation tasks (0.4); conferences with PRStacey re sample data summary organization (1.2).	4.90	612.50
11/15/02	KLK	Review documents and add to Peronard Exhibit List if relevant (5.50).	5.50	687.50
11/15/02	MCL	Prepare exhibit list including review of documents for potential listing (9.20).	9.20	1,150.00

December 24, 2002

W.R. Grace

Page 46  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

**Itemized Services**

Date	Tkpr	Description	Hours	Value
11/15/02	JLS	Prepare exhibit list including review of documents for potential listing (9.80); conference call with KJCoggon, NKABerle and AECarroll re trial exhibit list (0.40); load Chatfield deposition in LiveNote (0.20); review and edit Peronard exhibit list (1.20).	11.60	1,450.00
11/15/02	PRS	Conference with JLSherman, AECarroll and NKABerle re status of trial exhibit lists (0.4); data sort (0.3); review documents for potential use as trial exhibits and prepare exhibit list (5.0).	5.70	712.50
11/15/02	SCH	Database coding, update database coding, maintenance and distribution of documents.	0.00	0.00
11/15/02	MBF	Compile data sets in preparation of trial exhibits (4.90).	4.90	441.00
11/16/02	LB	Review documents for selection as potential Peronard trial exhibits (7.10); office conference with JDMcCarthy re trial preparation (.40); review court order re administrative record and exceptions (.20); attend portion of office conference with KJCoggon and KWLund re trial preparation, including order from court re scope of evidence (.80).	8.50	3,400.00
11/16/02	KWL	Review documents re trial exhibit list (2.20); meeting with KJCoggon and LBrown re case status and strategy (.80).	3.00	1,050.00
11/16/02	JDM	Meet with LBrown re mortality study and screening study (0.4); review EPA production re exhibits (7.2); meet with LBrown and KJCoggon re documents and strategy (1.2).	8.80	2,640.00
11/16/02	KJC	Conference with KWLund and LBrown re trial preparation, including order from court re scope of evidence (0.80); conferences with LBrown and JDMcCarthy re trial exhibits and issues (1.20); review key documents for trial exhibits (6.20); revise agenda for client meeting (0.40).	8.60	2,365.00

December 24, 2002

W.R. Grace

Page 47  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

**Itemized Services**

Date	Tkpr	Description	Hours	Value
11/16/02	JAH	Consider and prepare revisions to Meeker cross-examination outline re various USGS studies (3.50); consider and prepare revisions to Millette cross-examination outline (3.00).	6.50	1,430.00
11/16/02	NKA	Prepare exhibit list including review of documents for potential listing (4.50).	4.50	495.00
11/16/02	AEC	Prepare exhibit list including review of documents for potential listing (3.2).	3.20	400.00
11/16/02	JLS	Prepare exhibit list including review of documents for potential listing (7.40); conferences with LBrown, KJCoggon, NKAberle and AECarroll re trial exhibit list (0.40).	7.80	975.00
11/17/02	LB	Review documents as potential trial exhibits, including office conferences with JDMcCarthy, AECarroll, and CLNeitzel re same (9.80).	9.80	3,920.00
11/17/02	JDM	Outline Locky talking points (0.9); review production for trial exhibits (7.3); telephone conference with CLNeitzel re exhibits and Moolgavkar outline (0.2).	8.40	2,520.00
11/17/02	CLN	Evaluate Administrative Record comments and health studies sent by W. Hughson for possible inclusion on exhibit list (5.30); telephone conference with JDMcCarthy re exhibits and Moolgavkar outline (0.2).	5.50	1,650.00
11/17/02	AEC	Prepare exhibit list including review of documents for potential listing (4.0).	4.00	500.00

December 24, 2002

W.R. Grace

Page 48  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

**Itemized Services**

Date	Tkpr	Description	Hours	Value
11/18/02	LB	Office conference with KWLund, JDMcCarthy, KJCoggon, and Gary Graham re pretrial conference (.70); review United States' drafts of pretrial order and proposed undisputed facts (.30); office conference with JDMcCarthy and Gary Graham re pretrial action items and strategy (1.30); pretrial conference with United States and Grace trial teams (3.00); office conferences with KJCoggon re trial strategy and action items (1.30); conference with KWLund, JDMcCarthy, KJCoggon, NKAblerle, JLSherman, and AECarroll re trial preparation (1.10); office conference with CLNeitzel, JDMcCarthy, and Gary Graham re medical issues for trial and approach re same (1.00).	8.70	3,480.00
11/18/02	CGH	Review of remaining workfiles for documents for designation.	0.70	245.00
11/18/02	KWL	Prepare for meeting with Department of Justice re exhibit exchange and pre trial preparation, including meeting with internal Grace team (1.80); meeting with Department of Justice re same (3.0); debriefing with trial team re Department of Justice meeting (.30); review documents for inclusion into Grace exhibit list (2.50).	7.60	2,660.00
11/18/02	JDM	Meet with KWLund, LBrown, KJCoggon, and Gary Graham re pretrial conference (0.7); review proposed stipulation of facts and propose changes (0.5); telephone conference with JLSherman re exhibits (0.1); prepare for pretrial conference with the government (1.2); pretrial conference with government (3.0); meet with G. Graham and LBrown re pretrial action items and strategy (1.0); meet with CLNeitzel re expert preparation (0.7); prepare for meeting with experts (2.5).	9.70	2,910.00

December 24, 2002

W.R. Grace

Page 49  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

**Itemized Services**

Date	Tkpr	Description	Hours	Value
11/18/02	CLN	Evaluate Camus study and other mesothelioma studies for possible exhibits (3.80); conference with LBrown, G.Graham and JDMcCarthy re pretrial action items and strategy (1.00); conference with JDMcCarthy re Moolgavkar preparation (.70).	5.50	1,650.00
11/18/02	KJC	Address inquiries and issues re document databases (0.30); respond to questions from client and team re facts and documents (0.60); coordinate expert work including review and respond to e-mail and messages and telephone conferences with experts and counsel (0.20); address trial logistics and issues (0.40); pretrial conference with DOJ (3.00); conference with LBrown, KWLund, JDMcCarthy, JLSherman, NKAblerle and AECarroll re trial strategy (1.10); review and address documents for trial exhibit list (3.20); Draft letter to J. Freeman re witnesses (0.30); conferences with LBrown re trial strategy (1.80); conference with KWLund re trial strategy (1.20); conferences with JDMcCarthy re trial strategy (0.60).	12.70	3,492.50
11/18/02	EES	Review revised demonstrative exhibits (1.80); review revised deposition designations (2.10); review publications by Nelson Shapiro (indirect cost issues) (3.70).	7.60	2,128.00
11/18/02	ATC	Research re definition of "publish" in FRE 803(18).	6.60	1,155.00
11/18/02	JAH	Review documents from production database for Meeker cross-examination outline (2.00); review materials and revise findings of facts for ATSDR issues (2.00).	4.00	880.00
11/18/02	NKA	Prepare exhibit list including review of documents for potential listing (5.50); attend conference re pretrial order with DOJ/EPA attorneys (3.20); conference with Grace trial team re pretrial order, schedule and strategy (.80); edit and format draft exhibit list for internal distribution (.60);	10.10	1,111.00

December 24, 2002

W.R. Grace

Page 50  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

**Itemized Services**

Date	Tkpr	Description	Hours	Value
11/18/02	AEC	Prepare and edit draft exhibit list including review of documents for potential listing (6.2); attend meeting with KWLund, LBrown, JDMcCarthy, KJCoggon, NKAblerle and JLSherman re trial preparation tasks (1.1).	7.30	912.50
11/18/02	KLK	Update timeline of contractor activities at Libby site (6.2).	6.20	775.00
11/18/02	MCL	Prepare exhibit list including review of documents for potential listing (2.80); review and organize data re EPA sampling in Libby to support statement of facts and expert review (1.00).	3.80	475.00
11/18/02	JLS	Prepare exhibit list including review of documents for potential listing (3.30); attend meeting with LBrown, KWLund, KJCoggon, JDMcCarthy, NKAblerle and Department of Justice re pre-trial order (3.00); attend meeting with LBrown, KWLund, KJCoggon, JDMcCarthy, NKAblerle and AECarroll re trial strategy (1.10).	7.40	925.00
11/18/02	PRS	Review documents for potential use as trial exhibits and prepare exhibit list (2.4).	2.40	300.00
11/18/02	DRD	Review, categorize and code documents produced by EPA for relevance to various case issues.	2.50	150.00
11/18/02	MBF	Create list of audio/visual items to be included on draft trial exhibit list for LBrown (.60).	0.60	54.00
11/18/02	ICM	Conduct research to procure guidance documents cited by various sources to develop notebook on theory of the case.	1.50	165.00
11/19/02	LB	Telephone conference with KJCoggon re various trial preparation issues (.40).	0.40	160.00
11/19/02	JDM	Prepare for meeting with S. Moolgavkar and J. Turim (1.7); meet with S. Moolgavkar and J. Turim re trial preparation (7.5).	9.20	2,760.00

December 24, 2002

W.R. Grace

Page 51  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

**Itemized Services**

Date	Tkpr	Description	Hours	Value
11/19/02	CLN	Review of summaries of Administrative Record to identify additional documents for exhibits.	2.00	600.00
11/19/02	KJC	Address inquiries and issues re document databases (0.30); respond to questions from client and team re facts and documents (0.70); coordinate expert work including review and respond to e-mail and messages and telephone conferences with experts and counsel (0.30); address trial logistics and issues (0.30); conferences with JLSherman, NKAberle, AECarroll, and technical support personnel re hyperlinks, trial exhibits, databases and logistics (1.50); conference with CLNeitzel re exhibits for trial (0.40); draft schedule for remaining pretrial order tasks (0.40); telephone conference with LBrown re schedule, trial brief and other case issues (0.40); conference with Lev Ropes re graphics for trial (3.80); address issues re trial exhibits (0.40).	8.50	2,337.50
11/19/02	EES	Review additional Nelson Shapiro materials for possible impeachment (2.90); review and finalize Missy Koppelman deposition designations (1.40); phone conferences with accounting experts re demonstrative exhibit issues (.70); review and finalize William Hurley deposition designations (1.80); review and supplement Katherine Kirkland deposition proffers (2.10).	8.90	2,492.00
11/19/02	GMB	Draft outline of potential trial brief (3.20); review findings of fact (3.20).	6.40	1,408.00
11/19/02	ATC	Draft memo re definition of "publish" in FRE 803(18).	4.80	840.00
11/19/02	JAH	Review documents in production database relating to ATSDR issues (4.00); consider and revise findings of fact and conclusions of law re ATSDR (3.50).	7.50	1,650.00

December 24, 2002

W.R. Grace

Page 52  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

**Itemized Services**

Date	Tkpr	Description	Hours	Value
11/19/02	NKA	Attend meeting with AECarroll, JLSherman, KJCoggon and trial support team re final pretrial order preparation (1.50); meeting the JLSherman, AECarroll, and CCotts re database and field changes for trial preparation (1.20); prepare exhibit list including review of documents for potential listing (3.50).	6.20	682.00
11/19/02	AEC	Attend meeting with KJCoggon, NKAblerle and JLSherman re final pre-trial order task (1.5); attend meeting with CCotts, NKAblerle and JLSherman re trial database preparation (1.2); revise and edit draft trial exhibit list to prepare for database migration (4.8).	7.50	937.50
11/19/02	KLK	Update timeline of contractor activities at Libby site (4.5).	4.50	562.50
11/19/02	MCL	Review and organize data re EPA sampling in Libby to support statement of facts and expert review (4.80).	4.80	600.00
11/19/02	JLS	Prepare exhibit list including review of documents for potential listing (3.90); meeting with KJCoggon, NKAblerle, AECarroll, WBrown, MThompson and NStrizek re database issues including hyperlinking exhibits for trial (1.50), meeting with CCotts, NKAblerle and AECarroll re creating exhibit database for trial (1.20).	6.60	825.00
11/19/02	PRS	Review EPA sampling data documents for use as potential trial exhibits (4.2).	4.20	525.00
11/19/02	DRD	Review, categorize and code documents produced by EPA for relevance to various case issues.	2.50	150.00
11/19/02	SCH	Telephone conference with and/or e-mail memoranda from JLSherman re document requests and inquiries; copying and distribution of requested documents and respond to inquiries (0.50); database coding/review of earlier DCS entries (1.0); file maintenance of documents (1.0)	0.00	0.00

December 24, 2002

W.R. Grace

Page 53  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

**Itemized Services**

Date	Tkpr	Description	Hours	Value
11/19/02	ICM	Conduct research to procure guidance documents cited by various sources to develop notebook on theory of the case.	1.00	110.00
11/20/02	LB	Conferences with KJCoggon re action items for trial preparation (3.20); prepare for client meeting (3.10); conference with KJCoggon and Gary Graham re client meeting and trial brief (.30); conference with KJCoggon, Gary Graham, GMBarry, and JAHall re trial brief (1.50):	8.10	3,240.00
11/20/02	CGH	Preparation and review of cross-examination outline for Peronard.	0.80	280.00
11/20/02	KWL	Review Department of Justice witness list and exhibit list (1.0); prepare for client strategy meeting by reviewing summary judgement briefs and key witness depositions (2.40).	3.40	1,190.00
11/20/02	JDM	Meet with S. Moolgavkar and J. Turim re trial preparation (5.0); draft outline of expert testimony and additional research (1.7).	6.70	2,010.00
11/20/02	CLN	Review Administrative Record information for exhibits and provide exhibits to KJCoggon.	1.30	390.00

December 24, 2002

W.R. Grace

Page 54  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

**Itemized Services**

Date	Tkpr	Description	Hours	Value
11/20/02	KJC	Draft, review and edit findings of fact and conclusions of law (2.00); address billing issues from team, vendors and experts (0.10); address inquiries and issues re document databases (0.30); respond to questions from client and team re facts and documents (0.40); coordinate expert work including review and respond to e-mail and messages and telephone conferences with experts and counsel (0.20); address trial logistics and issues (0.70); telephone conference with D. Van Orden re summary exhibits (0.90); conferences with LBrown re trial brief, client meeting, final pretrial order, data, exhibits and other documents (3.20); conference with LBrown and G. Graham re client meeting and trial brief (0.30); conference with LBrown, G. Graham, GMBarry, JAHall re trial brief (1.50); telephone conferences with KWLund re client meeting, witnesses and other issues (0.60); revise final pretrial order (1.30); review, assess and research re plaintiff's witness list (1.20); conferences with EEStevenson re trial preparation (0.30).	12.40	3,410.00
11/20/02	EES	Review and complete Timothy Wall deposition testimony proffers (1.90); meeting with LBrown re cost and exhibit issues (1.40); revise demonstrative exhibits (2.20); review potential Sharon Campolucci trial exhibit documents (2.70); begin review of potential Wendy Line trial exhibit documents (.90).	9.10	2,548.00
11/20/02	GMB	Conference with LBrown, KJCoggon, G. Graham and JAHall re trial brief (1.30); conference with JAHall re division of labor on trial brief (.30); draft trial brief (4.80); review DOJ responses to motion summary judgments (3.10).	9.50	2,090.00
11/20/02	ATC	Revise memo re definition of "publish" in FRE 803(18) (1.9); review NPL binders for World Trade Center documents (2.0).	3.90	682.50

December 24, 2002

W.R. Grace

Page 55  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

## Itemized Services

Date	Tkpr	Description	Hours	Value
11/20/02	JAH	Attend strategy meeting with KJCoggon, LBrown and GMBarry re trial brief and prepare outline of same (1.30); conference with GMBarry re same (.30); receive and evaluate U.S. reply in support of motion for summary judgment on third defense (.20); consider and review materials in preparation of trial brief (5.30).	7.10	1,562.00
11/20/02	NKA	Review and revise exhibit list, including code documents in EPA production database with proper information (6.30); research and prepare summary of documents for review re plaintiff's witness per EESTevenson's request (.70); conference with LBrown and KJCoggon re Libby Community Interviews, and create document for summary of same (1.60).	8.60	946.00
11/20/02	AEC	Prepare final exhibit list including review of documents for potential listing (6.8); database research re new witnesses designated by DOJ (1.2).	8.00	1,000.00
11/20/02	KLK	Update timeline of contractor activities at Libby site (4.0).	4.00	500.00
11/20/02	JLS	Prepare exhibit list including review of documents for potential listing (6.70); telephone conferences with NKAblerle, KJCoggon and AECarroll re same (0.80) (N/C).	6.70	837.50
11/20/02	PRS	Review EPA sampling data documents for use as potential trial exhibits (0.8).	0.80	100.00
11/20/02	DRD	Review, categorize and code documents produced by EPA for relevance to various case issues.	2.50	150.00
11/20/02	LAM	Review, categorize and code documents produced by EPA for relevance to various case issues.	4.00	240.00
11/20/02	MBF	Research for LBrown to find information on DOJ witness Judy Lehmann (.80).	0.80	72.00

December 24, 2002

W.R. Grace

Page 56  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

**Itemized Services**

Date	Tkpr	Description	Hours	Value
11/20/02	ICM	Conduct research to procure guidance documents cited by various sources to develop notebook on theory of the case.	2.00	220.00
11/21/02	LB	Prepare for meeting with client (.70); attend trial team meeting (.50); meeting with KJCoggon, KWLund, JDMcCarthy, and Gary Graham re trial preparation status and preparation for meeting with client (1.00); review and revise potential fact stipulations (1.00); attend portion of meeting with client re case status and trial preparation and strategy (3.90).	7.10	2,840.00
11/21/02	CGH	Review of work files for additional potential trial exhibits.	1.00	350.00
11/21/02	KWL	Attend trial team meeting (.50); meeting with LBrown, KJCoggon, JDMcCarthy and Gary Graham re trial preparation status and to prepare for meeting with client (1.0); meet with client re case status and trial preparation strategy (5.60).	7.10	2,485.00
11/21/02	JDM	Prepare for client case status/strategy meeting (1.5); meet with LBrown, KWLund, KJCoggon and Gary Graham re case strategy (1.5); attend portion of meeting with client re case status and trial strategy (5.5); review and revise stipulated facts (0.5); exchange e-mails with experts re IRIS (0.2); conference with KJCoggon re fact stipulations (0.1).	9.30	2,790.00
11/21/02	CLN	Conference with LBrown re health assessments.	0.30	90.00
11/21/02	KJC	Prepare for client strategy meeting (0.30); meeting with G. Graham, LBrown, KWLund and JDMcCarthy re trial preparation status and to prepare for meeting with client (1.00); meeting with client re case status and trial preparation strategy (5.60); review and revise stipulated facts (0.70); conference with JDMcCarthy re stipulated facts (0.10); address questions from team re facts and documents (0.40); attend trial team meeting (.50).	8.60	2,365.00

December 24, 2002

W.R. Grace

Page 57  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

## Itemized Services

Date	Tkpr	Description	Hours	Value
11/21/02	EES	Trial team meeting (.50); review and revise draft cost trial stipulations (1.10); review additional Sharon Campolucci documents for use as potential trial exhibits (4.30); review Betty Jones documents for potential use as trial exhibits (1.90); review and finalize Daniel Figueroa (CDM) cost deposition proffers (2.60).	10.40	2,912.00
11/21/02	GMB	Lexis research for trial brief on burden of proof (1.40); attend trial team meeting (.50); draft trial brief re naturally occurring and building products exceptions (3.30); edit trial brief (3.60).	8.80	1,936.00
11/21/02	ATC	Attend trial team meeting (0.5); research re California sovereign immunity (3.80).	4.30	752.50
11/21/02	JAH	Attend trial team meeting (.50); review materials from production database relating to ATSDR issues (3.80); consider and prepare conclusions of law in support of trial brief (2.80).	7.10	1,562.00
11/21/02	NKA	Review and revise exhibit list, include code documents in EPA Production database with proper information, and review of documents for potential listing (6.70); attend trial team meeting (.50); work with MHHiguera re database searches for R.J. Lee comments and SEM/IR information (1.10); prepare documents requested by EESStevenson re S.Campolucci (1.90); work with LAMartel re Libby Community Interview Summary and edit excel spreadsheet re same (.60); conference with AECarroll and JLSherman re trial exhibit list tasks (.50).	11.30	1,243.00
11/21/02	AEC	Prepare and edit final exhibit list including review of documents of potential listing (6.4); conference with NKABerle and JLSherman re trial exhibit list tasks (0.5); attend trial team meeting (0.5).	7.40	925.00
11/21/02	DD	Review and organize data re EPA sampling in Libby to support statement of facts and expert review (1.8).	1.80	198.00

December 24, 2002

W.R. Grace

Page 58  
 Invoice No.: 618227  
 Client No.: 04339  
 Matter No.: 00302

**Itemized Services**

Date	Tkpr	Description	Hours	Value
11/21/02	KLK	Update timeline of contractor activities at Libby site (3.0).	3.00	375.00
11/21/02	MCL	Review and organize data re EPA sampling in Libby to support statement of facts and expert review (3.40).	3.40	425.00
11/21/02	JLS	Prepare exhibit list including review of documents for potential listing (6.80); conferences with AECarroll and NKAberle re same (0.50); prepare list of edits for trial exhibit database (1.10); telephone conference with CCotts re trial exhibit database and requested edits to same (0.30); attend trial team meeting (0.50).	9.00	1,125.00
11/21/02	PRS	Review EPA sampling data for use as potential trial exhibits (3.4).	3.40	425.00
11/21/02	DRD	Review, categorize and code documents produced by EPA for relevance to various case issues.	2.50	150.00
11/21/02	SCH	Database coding, update database coding, maintenance and distribution of documents.	0.00	0.00
11/21/02	LAM	Review, categorize and code documents produced by EPA for relevance to various case issues.	2.30	138.00
11/21/02	MBF	Research issue for LBrown related to EPA providing determination to the Agency for Toxic Substances and Disease Control for need for health assessment at Libby (1.30); obtain EPA guidance documents for KJCoggon (.40); cite-check findings of fact for JAHall (3.00); research regarding current version of Public Health Assessment Manual (.30).	5.00	450.00
11/21/02	ICM	Conduct research to procure guidance documents cited by various sources to develop notebook on theory of the case.	5.00	550.00